



PHONE INTERNET WIRELESS

February 19, 2009

Ms. Marlene H. Dortch
Office of Secretary
Federal Communication Commission
445 12th Street SW
Washington, DC 20554

RE: EB Docket 06-36/Annual Certifications and Accompanying Statement for 2008

Dear Ms. Dortch,

Pursuant to section 64.2009(e) if the Commission's rules 1 and the Commission Public Notice DA 09-9, dated January 7, 2009 in the above captioned matter, First Communications, LLC hereby submits its compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with these regulations.

Should you have any questions or require additional information regarding this matter, please do not hesitate to contact me at the number below.

Respectfully,

A handwritten signature in black ink, appearing to read "Abby Knowlton", with a stylized flourish at the end.

Abby Knowlton
Vice President, Carrier Relations
First Communications, LLC
Telephone/Facsimile 888-777-3300
aknowlton@firstcomm.com

cc: Federal Communication Commission (2 copies)
Enforcement Bureau
445 12th Street SW
Washington, DC 20554

&

Best Copy and Printing, Inc
Via e-mail: fcc@bcpiweb.com



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 19, 2009

Name of company(s) covered by this certification: First Communications, LLC

Form 499 Filer ID: 819644

Name of signatory: Joseph R. Morris

Title of signatory: Chief Operating Officer

I, Joseph R. Morris, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed _____



Attachment A

Customer Proprietary Network Information Policy

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First Communications, LLC has established policies and procedures to satisfy compliance with the Federal Communications Commission's ("FCC's") rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in sections 64.2001 et seq. First Communications, LLC takes steps to secure the privacy of all of its customers' information, as evidenced by the Privacy Policy posted on its website and the specific policy regarding the use of CPNI.

This attachment summarizes the steps taken by First Communications, LLC to implement its CPNI policy.

- First Communications, LLC has a company manual that details how employees are expected to treat any confidential information.
- All employees are required to sign the company manual as a condition of employment.
- All customer information is maintained in a password protected database that can be accessed only by authorized employees.
- Authorized First Communications, LLC employees may access CPNI to address customer questions only when the person calling provides the correct password or is listed as an "authorized contact" for the business customer.
- First Communications, LLC requires prior written approval from customers for any information disclosed to a third party, except to the extent the disclosure is required for the purpose of the agreement.
- First Communications, LLC's contracts require the company to have protective non-disclosure agreements in place with any third parties involved in the provision of a customer's private line service prior to any disclosure.
- First Communications established passwords and reminder questions for all new customers and all customers requesting call detail information once positive verification is obtained.
- First Communications notifies all customers when there is a change of the password, reminder question or answer, the address of record or the on-line access information.
- In accordance with First Communications' policy, First does not use for any marketing purpose other than to market services to customers within the same category of service to which they already subscribe. First also may use CPNI as required to render services and to bill for such services. First does not share CPNI with affiliates.